

Exhibit A

Voir Dire Questions

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0. [Have the attorneys and parties introduce themselves.]
1. Ask if potential juror or family/close friend knows any of the lawyers or parties involved.
2. Ask if potential juror has heard or read anything about the case.
3. Ask if potential juror or family/close friend knows any of the potential witnesses.
 - [List of Witnesses]
4. Prior Participation in a Lawsuit –
Have you or any member of your immediate family or anyone you are close with ever participated in a lawsuit as a party or in any other capacity?
5. Prior Jury Service –
If you have previously served as a juror (in a criminal, civil, state, or federal case) or a member of a grand jury (in state or federal court), is there anything about that prior service that would affect your ability to serve as a fair and impartial juror in this case?
6. Strong Feelings about the Civil Justice System –
Do you have any strong feelings about the civil justice system, lawsuits, or lawyers that might interfere with or

affect your ability to serve as a fair and impartial juror in this case?

7. Willingness to Follow Law (a) –

You must follow the law, as I provide it to you, in deciding this case. You must put aside any notions about what you thought the law requires or what you think the law should require, and follow only my instructions to you about the law. Are you unwilling or unable to apply the law as I will give it to you?

8. Rendering a Fair Verdict –

Do you have any personal beliefs that might interfere with or affect your ability to serve as a fair and impartial juror in this case?

(I do not want to know your personal beliefs—unless those beliefs could somehow interfere with your ability to follow the law, as I instruct you, and to render a fair verdict in this case).

9. Disability –

Do you have a disability, physical or otherwise, that would make serving as a member of the jury difficult or impossible, or might otherwise interfere with your service as a juror?

10. English Fluency/Literacy –

Do you have any difficulty understanding or reading English?

11. Hardship –
Anyone who serves on the jury will, of course, be inconvenienced to some extent. However, jury service in this trial will NOT last more many weeks or months, as some trials do. Instead, I expect it to last [NUMBER] days plus the time it takes for the jury to deliberate. Having explained the schedule, will this schedule or the length of trial pose a SERIOUS or EXTRAORDINARY hardship for you?
12. [PARTY-PROPOSED / CASE-SPECIFIC QUESTION]
13. [PARTY-PROPOSED / CASE-SPECIFIC QUESTION]
14. [ETC]